

1                   UNITED STATES DISTRICT COURT  
2                   SOUTHERN DISTRICT OF NEW YORK  
3                   - - -  
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5                   IN RE: TERRORIST ATTACKS       : 03-MDL-1570  
6                   ON SEPTEMBER 11, 2001           : (GBD) (SN)  
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10                  APRIL 6, 2021  
11                  THIS TRANSCRIPT CONTAINS  
12                  CONFIDENTIAL MATERIAL  
13                  - - -  
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15                  Remote Videotaped  
16                  Deposition, taken via Zoom, of CHAS W.  
17                  FREEMAN, JR., commencing at 9:08 a.m., on  
18                  the above date, before Amanda  
19                  Maslynsky-Miller, Certified Realtime  
20                  Reporter and Notary Public in and for the  
21                  Commonwealth of Pennsylvania.  
22

23                  - - -  
24                  GOLKOW LITIGATION SERVICES  
25                  877.370.3377 ph | 917.591.5672 fax  
26                  deps@golkow.com  
27  
28

1 obligations on anyone or anonymity.

2 Q. And was the fact that the  
3 mosque was able to collect and divert  
4 monies to the terrorist entities  
5 something that you understood to be a  
6 problem?

7 A. There was a consistent  
8 problem with local recipients of charity  
9 attempting to divert funds. That is the  
10 essence of the problem described in the  
11 9/11 report.

12 It is not the headquarters'  
13 intention that the funds should be  
14 diverted, but some were diverted.

15 Q. And at the time were you  
16 identifying to 9/11 Commission  
17 investigators that the Saudi form of  
18 giving through the Kingdom's charitable  
19 organizations supported a lack of  
20 accountability that enabled the kind of  
21 flow of terror financing that you  
22 mentioned to the investigators?

23 MR. NASSAR: Objection.

24 MR. HAEFELE: You can

1 answer.

2 THE WITNESS: My statement  
3 was not exactly that. My  
4 statement was that the nature of  
5 charitable donations in the  
6 Kingdom at the time, and  
7 historically, had not involved  
8 strict audit trails.

9 That has since changed. In  
10 fact, it began to change even  
11 before 9/11.

12 BY MR. HAEFELE:

13 Q. And you understood that the  
14 lack of accountability as a result of the  
15 lack of any strict audit trails left open  
16 the possibility for finances to be  
17 diverted, correct?

18 A. So I was informed by the  
19 people who monitored this, yes.

20 Q. And the concern that you  
21 were identifying to the 9/11 Commission  
22 investigators was that the lack of  
23 accountability in the flow of money  
24 through the Saudi charities allowed Al

1 Form.

2 MR. HAEFELE: You can  
3 answer.

4 THE WITNESS: Several times  
5 a year. The organization, the  
6 Middle East Policy Council, lived  
7 very much hand to mouth. The  
8 purpose of my trips was mainly to  
9 meet with individuals in the Saudi  
10 private sector, as well as  
11 American company officials, who  
12 saw the value of the Middle East  
13 Policy Council's work and,  
14 therefore, encouraged their  
15 headquarters in the United States  
16 to provide funding.

17 BY MR. HAEFELE:

18 Q. Who are the senior Saudi  
19 officials who took your meetings during  
20 these fundraising trips that you  
21 referenced in the -- to the 9/11  
22 Commission investigators?

23 A. Typically, I would see the  
24 King, the Crown Prince, the Minister of

1     Interior, the Foreign Minister or his  
2     Deputy, the Chief of the Istikhbarat,  
3     which is the foreign intelligence  
4     organization of Saudi Arabia. I might  
5     also see the Minister of Petroleum and  
6     Minerals. All of whom are personal  
7     friends.

8                   Q.     The King, the Crown Prince,  
9     the Minister of Interior, the Foreign  
10   Minister, the Chief of Foreign  
11   Intelligence.

12                  Are they all members of the  
13   Saudi Royal Family?

14                  A.     Yes.

15                  Q.     Was the Minister of  
16   Petroleum and Minerals also a member of  
17   the Royal Family?

18                  A.     No, not at that time.

19                  Q.     Is he now?

20                  A.     Yes.

21                  Q.     When you went and did your  
22   fundraising trips, were most of your  
23   meetings with members of the Saudi Royal  
24   Family -- most of your meetings in the

1 declaration?

2 A. No.

3 Q. Did you have any dialogue  
4 with anybody at the Department of Justice  
5 before you submitted your declaration?

6 A. No.

7 Q. Have you discussed with  
8 anybody in the United States government  
9 related to the 9/11 attacks?

10 A. Yes. I was consulted  
11 frequently by the intelligence agencies,  
12 the CIA in particular, in the immediate  
13 aftermath of the 9/11 attack.

14 I also periodically reported  
15 the substance of my conversations in  
16 Saudi Arabia on various topics to the  
17 intelligence agencies.

18 Q. When you say you reported  
19 the substance of your conversations in  
20 Saudi Arabia on various topics to  
21 intelligence agencies, what substance of  
22 conversations?

23 A. The major interest on the  
24 part of the intelligence agencies

1      appeared to be related to the oil sector,  
2      oil pricing, oil policy, energy pricing  
3      and also objections to American military  
4      activity in and around Saudi Arabia, not  
5      9/11.

6            Q.      And who were the discussions  
7      with on the Saudi end?

8            A.      Sorry?

9            Q.      Who were your discussions  
10     with on the Saudi end that you were  
11     reporting to the U.S.?

12           A.      All of the people I  
13     mentioned earlier, the King, the Foreign  
14     Minister, the Minister of Interior, the  
15     Chief of Foreign Intelligence, the  
16     Petroleum Minister, Saudi Aramco.

17           Q.      What intelligence agencies  
18     were you providing information to?

19           A.      CIA.

20           Q.      Anybody else?

21           A.      No, I don't think so.

22           Q.      Did you have any dialogue  
23     with any of the State Department or with  
24     the DOJ?

1 did you stay at the -- the residence --  
2 was the residence part of the consulate  
3 or separate?

4 A. The consulate, at that time,  
5 was a compound with multiple houses and  
6 buildings on it. And one of the smaller  
7 houses was allocated to me, if I spent  
8 time in Jeddah.

9 For the most part, during  
10 the war, however, I flew on a military  
11 jet from Riyadh to Jeddah and returned  
12 immediately after whatever meeting I had  
13 gone there to conduct.

14 Q. All right. When you were in  
15 Jeddah, were you staying on the compound  
16 where the consulate was?

17 A. If I stayed there, yes.  
18 Typically --

19 Q. How often -- often was that?

20 A. I visited Jeddah 52 times  
21 from August 2nd, 1990, through the  
22 ceasefire on March 2nd, 1991. I think --

23 Q. How do you know -- how do  
24 you know it was 52 times?

1 human rights practices. I have many  
2 friends in the Kingdom with a wide  
3 variety of views, some of which are  
4 critical of government policy, and I  
5 privately agree with those.

6 Q. Do you view the government  
7 of Saudi Arabia as being monolithic, that  
8 is, that everybody in the government has  
9 the same view of how to run the  
10 government?

11 A. Of course not.

12 Q. Have you ever testified in a  
13 lawsuit previously?

14 A. No.

15 Q. You testified through  
16 declaration in this case previously,  
17 correct?

18 A. If you're referring to the  
19 document on sovereign immunity I wrote,  
20 yes, I suppose so.

21 Q. And when you testified in  
22 that regard, did you prepare the document  
23 with the assistance of counsel for the  
24 Kingdom of Saudi Arabia?

1                   Q.        And you've never been  
2        qualified by any court to testify in any  
3        litigation, either civil or criminal,  
4        correct?

5                   A.        Well, that follows from my  
6        not having ever attempted it.

7                   Q.        I take it that means you've  
8        never been offered as an expert witness  
9        in any legal proceedings and not  
10       permitted to testify, correct?

11                  A.        That's right.

12                  Q.        In this case -- let's see.

13                  MR. HAEFELE: Do you need a  
14        break now? Now is a natural  
15        breaking point if you need a  
16        break. If not, we can keep going.

17                  THE WITNESS: I'm okay.

18        BY MR. HAEFELE:

19                  Q.        All right. What is it that  
20        WAMY has asked you to testify about in  
21        this case?

22                  A.        They've asked me to draw on  
23        my personal and professional experience,  
24        as someone who was responsible for U.S.

1      relations with Saudi Arabia, about the  
2      Kingdom, its history, its relation to  
3      religion, its relationships to terrorist  
4      activities overseas. And that is what I  
5      have done. That is the subject of my  
6      report.

7                    Q.      If we can turn back to your  
8      report, which is marked as Exhibit-236.

9                    COURT REPORTER: It's  
10                    Exhibit-536.

11                    MR. HAEFELE: I have it as  
12                    536, yes. The second item that we  
13                    marked today, I think. Did I say  
14                    something different?

15                    BY MR. HAEFELE:

16                    Q.      Ambassador Freeman, do you  
17                    have a copy of your report with you?

18                    A.      Yes.

19                    Q.      So it may make it easier.  
20                    We can put it up on the screen, but it  
21                    may make it easier if you're looking  
22                    through your report.

23                    Is one of the areas that is  
24                    a topic of your testimony, the history,

1 politics and culture of Saudi Arabia,  
2 including Wahhabism?

3 A. Yes.

4 Q. And another area of your  
5 report is world conflicts and their  
6 relationship to 9/11?

7 A. I wouldn't put it that way.

8 Q. Well, look at your report on  
9 the -- on the second paragraph.

10 MR. HAEFELE: Highlight that  
11 second paragraph.

12 BY MR. HAEFELE:

13 Q. I refer you to the third  
14 line down, World conflicts and their  
15 relationship to 9/11.

16 If you didn't put it that  
17 way, who did?

18 A. No, those are my words,  
19 referring to Afghanistan.

20 Q. Okay. So is another one of  
21 the topics of your report world conflicts  
22 and their relationship to 9/11?

23 A. Specifically Afghanistan.

24 Q. And is another area --

1 subject of your report the relationship  
2 between the Kingdom of Saudi Arabia and  
3 WAMY?

4 A. Yes.

5 Q. And is another area of your  
6 report the relationship between the  
7 Kingdom, Osama bin Laden and Al Qaeda?

8 A. Yes.

9 Q. All right. And that  
10 outlines the four areas that are  
11 referenced as being the subject of your  
12 testimony in this report; do you agree?

13 Where it says, I have been  
14 asked by WAMY to provide expert testimony  
15 concerning the history, politics and  
16 culture of Saudi Arabia, including  
17 Wahhabism, world conflicts and their  
18 relationship to 9/11, the relationship  
19 between the Kingdom of Saudi Arabia and  
20 WAMY, as well as the relationship between  
21 the Kingdom, Osama bin Laden, and Al  
22 Qaeda.

23 Are there any other areas  
24 that you've been asked to opine about?

1                   A.        So those are the focuses.

2                   Q.        When you say "those are the  
3    focuses" -- I should add other than  
4    rebutting some of the testimony of some  
5    of the plaintiffs' experts, are there any  
6    other subject areas that you have been  
7    called upon to offer your own opinions  
8    about?

9                   A.        I've offered my own opinions  
10    in the report, and they stand as they  
11    are.

12                  Q.        And that's what I'm asking  
13    you.

14                  At the outset of your  
15    report, you have identified what WAMY has  
16    asked you to opine about.

17                  And that is in this  
18    paragraph, correct?

19                  A.        Yes.

20                  Q.        And did you answer any  
21    other -- or offer opinions in any other  
22    areas other than what you were asked to  
23    opine on by WAMY?

24                  A.        Not really.

1 delegating responsibility to many people  
2 for looking at many questions, including  
3 these questions.

4 My personal involvement,  
5 however, is as stated, a single meeting  
6 with the World Muslim League.

7 Q. Have you opined at all as to  
8 whether any Saudi-sponsored charity has  
9 given material support to Al Qaeda?

10 MR. NASSAR: Objection to  
11 form.

12 THE WITNESS: Yes. Yes, I  
13 have offered opinions on that.

14 BY MR. HAEFELE:

15 Q. In your report?

16 A. Yes.

17 Q. Where in your report is that  
18 opinion?

19 A. It is throughout the report.  
20 It is the nature of Saudi charities  
21 organized by the government, including  
22 WAMY, about which I am speaking, to  
23 represent the interest of the Kingdom of  
24 Saudi Arabia in the religious sphere.

1                   Q.     And you just told us that  
2     you don't recall -- you recall that in  
3     the 1991 time period Al Qaeda hadn't  
4     existed yet.

5                   Did they come into existence  
6     while you were in Saudi Arabia?

7                   A.     As I left. I think in 1992.

8                   Q.     And so your recollection is  
9     that after you left Saudi Arabia, after  
10    1992, is when Al Qaeda came into  
11    existence, correct?

12                  A.     I was closely tracking the  
13    probability of terrorism as a result of  
14    the U.S. military overstaying their  
15    welcome in the Kingdom. And I recall  
16    hearing of the founding of Al Qaeda  
17    pretty much as I left the Kingdom.

18                  Q.     So your recollection would  
19    be it was -- I'm sorry, what month did  
20    you leave the Kingdom?

21                  A.     August 1992.

22                  Q.     So it would be in around  
23    August of '92 is what your recollection  
24    is as to when Al Qaeda was founded?

1 BY MR. HAEFELE:

2 Q. Mr. Freeman, your testimony  
3 is based on your personal information.  
4 You've already told me it's not based on  
5 documents.

6 If your testimony is based  
7 on your personal information and your  
8 personal experiences, then I'm asking you  
9 what your personal experiences are that  
10 support your opinion in this regard.

11 If you don't have an opinion  
12 in this regard, just tell me and we'll  
13 move on.

14 MR. GOETZ: And, Robert, you  
15 have to let him answer the  
16 questions completely. He was not  
17 allowed that courtesy.

18 BY MR. HAEFELE:

19 Q. Do you have anything else to  
20 add to your answer, Mr. Freeman?

21 A. In my interest in Saudi  
22 Arabia, which I left in 1992, returned to  
23 frequently as a visitor, I was very much  
24 aware, as the '90s proceeded, as a

1 steadily tightening security perimeter  
2 around various buildings and compounds,  
3 particularly where foreigners resided.

4 And the reason for this was  
5 a series of terrorist incidents. I  
6 remember there was a series of incidents.  
7 I was not resident in the Kingdom. I was  
8 never attacked at that time. And so I  
9 cannot tell you exactly when and where  
10 the incidents occurred. But there were a  
11 series of them.

12 Q. Would you agree that Wahhabi  
13 ideology is narrow-minded?

14 A. It's puritanical.

15 Q. Is it, in your view, harsh  
16 and unforgiving or austere?

17 MR. GOETZ: Objection to  
18 form.

19 THE WITNESS: The word  
20 "Wahhabi" conceals a multitude of  
21 beliefs and sects. If you are  
22 referring to the Saudi official  
23 Wahhabism, this is a quietest form  
24 of Wahhabism, which is supportive

1 of the monarchy. In fact, it  
2 asserts that a primary duty of any  
3 Muslim is to support a Muslim  
4 government. And in this case, the  
5 Kingdom of Saudi Arabia fits that  
6 definition.

7                   If you talk about Wahhabism  
8                   outside of Saudi Arabia, there are  
9                   a great number of movements that  
10                  have been labeled as such which  
11                  have no connection whatsoever to  
12                  those inside Saudi Arabia.

13 BY MR. HAEFELE:

14 Q. Would you agree -- would you  
15 agree that the atmosphere created by the  
16 Kingdom as a very narrow-minded, austere  
17 version of Islam certainly helped to  
18 spawn Al Qaeda?

19 MR. GOETZ: Objection.

20 Form.

1 region where that particular  
2 version of Islam prevailed. It  
3 was more Sunni influenced. He  
4 grew up in a part of the Kingdom  
5 which is also not Wahhabi.

6 He apparently came into  
7 contact with people from the  
8 Muslim Brotherhood in university,  
9 but did not show a great deal of  
10 interest in religion until his  
11 exile in Sudan, when he was  
12 recruited by the disciples  
13 of Sayyid al Qutb, who represents  
14 an entirely different strain of  
15 Islam, to embrace the extremism  
16 for which he later became famous.

17 BY MR. HAEFELE:

18 Q. So you don't agree that the  
19 atmosphere created by the Kingdom's  
20 narrow-minded, austere version of Islam  
21 certainly spawned Al Qaeda?

22 MR. GOETZ: Objection.

23 Form. Repetitive.

## 24 THE WITNESS: Al Qaeda is

1 the enemy of the Kingdom, not the  
2 product of it.

3 BY MR. HAEFELE:

4 Q. I'm asking you the answer to  
5 my question, not some other answer to  
6 some other question. I'm going to  
7 rephrase it, because it's not --

8 MR. HAEFELE: Don't object,

9                   Fred, because he hasn't answered  
10                  my question. You can object, but  
11                  I'm just going to ask for an  
12                  answer to my question.

13 BY MR. HAEFFLE:

14                           Q.     Would you agree, sir, that  
15     the atmosphere created by the Kingdom's  
16     very narrow-minded, austere version of  
17     Islam certainly helped to spawn Al Qaeda?

18 MR. GOETZ: Objection.

19 THE WITNESS: No.

20 MR. GOETZ: Repetitive.

24 MR. HAEFELE: Can we queue

1

- - -

2 THE WITNESS: Yes.

3 BY MR. HAEFELE:

4 Q. And these are four books --  
5 well, let me ask you this: Are the four  
6 books that are referenced here and the  
7 items referenced in your footnotes the  
8 entirety of your materials that you  
9 relied upon to derive your opinions,  
10 other than your personal experience?

11 A. No. As you noted earlier, I  
12 had multiple assignments in multiple  
13 parts of the world. Every place that I  
14 went I learned both the language and read  
15 the history and the culture of the place.

16 I read everything I could on  
17 Saudi Arabia when I was assigned there.  
18 There was very little of value. Some of  
19 the best material was provided to me by  
20 the Israeli embassy in Washington, which  
21 I asked to brief me on Israel's views of  
22 Saudi Arabia. And that consisted of  
23 books written by eminent professors at  
24 the Hebrew University of Jerusalem, all

1 of which --

2 Q. And have you -- sorry, go  
3 ahead.

4 A. All of which I read and  
5 found them sound in scholarship and  
6 lacking in what the Germans called  
7 grundwahrheit, meaning ground truth. The  
8 authors had never been to the Kingdom,  
9 they were writing about a place they did  
10 not know personally.

11 Q. And to the extent that you  
12 relied upon those documents, are they  
13 cited in your report, or did you omit  
14 them from your report on purpose?

15 A. No, I'm -- no, I'm not  
16 testifying from documents. I was asked  
17 for a brief reading list, which I  
18 provided.

19 Q. All right. So any document  
20 that you're relying upon for any part of  
21 your opinion is cited in your report,  
22 correct?

23 A. My opinion does not depend  
24 on documents. I cited it to corroborate

1 my opinion, not the other way around.

2 Q. How did you select what  
3 materials you would include in your brief  
4 reading list here?

5 A. These seemed to me to be the  
6 most objective works on the Kingdom.  
7 After 9/11, there was an avalanche of  
8 polemic writing. Most of the books that  
9 were produced are really not worth  
10 reading. These are.

11 Q. How did you select the  
12 materials that you would cite to in your  
13 report? And -- well, how would you  
14 select materials that you would cite in  
15 your report to corroborate your opinions?

16 A. I wrote the report. And  
17 then I looked online for things of which  
18 I was already familiar or which addressed  
19 the topic.

20 Q. And if you found something  
21 that was contrary to your opinions, what  
22 did you do with that?

23 A. I didn't find much that was  
24 contrary to my opinions.

1                   Q.        Two of the items that's on  
2        your brief reading list, the two Robert  
3        Lacey items, there's nothing in your  
4        report that's sourced to those two items.

5                   A.        No.

6                   Q.        What opinion in your report,  
7        if anything, is reliant upon or relied  
8        upon those to corroborate your opinions?

9                   A.        Nothing directly. The first  
10      book is a very good account of the  
11      history of the House of Saud. The second  
12      is an update, referring to modern times.

13                  Q.        We're going to get through  
14      it a lot quicker if you just confine your  
15      answers to my question.

16                  The question is, is there  
17      anything in your report that either of  
18      the Lacey books corroborates?

19                  A.        Plenty.

20                  Q.        All right. And if you went  
21      through your report, would you be able to  
22      explain why it is that you didn't cite to  
23      the Lacey books to corroborate what's in  
24      your report?

1                   A.        Because I am -- I was  
2       writing the report on the basis of  
3       personal experience and knowledge, which  
4       Mr. Lacey also did.

5                   Q.        And the Steve Coll book  
6       that's cited, it's cited three times in  
7       your report.

8                   Is it fair to say that you  
9       cited it for each item where you intended  
10      to rely upon the book as a source to  
11      corroborate your opinions?

12                  A.        Steve Coll interviewed me  
13      for his book. I looked to it for dates  
14      and specific material because I knew he  
15      had included it.

16                  Q.        Anything else?

17                  A.        No.

18                  Q.        All right. And, similarly,  
19      there's a Rundell cited five times in  
20      your report, but it doesn't actually  
21      indicate that it's David Rundell or that  
22      it's the Vision or Mirage book that's  
23      cited here.

24                   The citations to Rundell in

1 your report, is that intended to be to  
2 this book?

3 A. Yes.

4 Q. And have you cited the  
5 Rundell book for each opinion in your  
6 report that you relied upon -- where you  
7 relied upon the book?

8 A. I didn't really rely upon  
9 the book. But it is a very excellent  
10 account of Saudi history with specific  
11 reference to religious and political  
12 tensions in the Kingdom.

13 Q. Is it fair to say that your  
14 report is mostly prepared based on your  
15 own personal experience?

16 A. It is based on my personal  
17 and professional experience, yes.

18 Q. And is it accurate to say  
19 that whatever experience that you have on  
20 the history, politics and culture of  
21 Saudi Arabia, including Wahhabism, is  
22 based in large part on your three-year  
23 stint as Ambassador to the Kingdom?

24 A. Significantly, yes.

1 fact.

2 Q. Have you seen any documents  
3 that indicates any investigation into the  
4 internal controls of the money that was  
5 distributed by WAMY to any of its branch  
6 offices or from any of its branch  
7 offices?

8 A. Internal investigations by  
9 whom?

10 Q. Well, internal  
11 investigations by WAMY.

12 A. No, I've seen no documents.

13 Q. Have you seen any  
14 investigations by anybody else into WAMY?

15 A. There is references to WAMY  
16 in the 9/11 Commission report.

17 Q. All right. And have you  
18 seen any documents other than the 9/11  
19 Commission report that discuss  
20 investigations into the internal controls  
21 of the finances of WAMY?

22 A. Yes. I saw a report from --  
23 dated 2018 on the issue of financial  
24 controls relating to money laundering and

1 official of the Kingdom of Saudi Arabia?

2 A. No. I do not, for the most  
3 part, engage in consultant work. That is  
4 not what I do.

5 I prefer to do things rather  
6 than advise other people on how to do  
7 their business.

8 Q. Were you ever asked for your  
9 aid or consultancy with regard to  
10 opinions related to the Kingdom where you  
11 provided that consultation to either  
12 lawyers or lobbyists for the Kingdom of  
13 Saudi Arabia?

14 A. Never.

15 Q. Is it your opinion that  
16 Saudi charities could not or would not  
17 have provided support to Al Qaeda because  
18 the Saudi Arabia government was  
19 ideologically opposed to Al Qaeda?

20 A. The Saudi Arabian government  
21 regarded Al Qaeda as its principal enemy.  
22 The internal security mechanisms of the  
23 Kingdom are notoriously effective.  
24 Anybody who tried to help Al Qaeda would

1 have suffered extreme penalty.

2 Q. Do you know who Wa'el  
3 Julaidan is?

4 A. Sorry?

5 Q. Do you know who Wa'el  
6 Julaidan is?

7 A. I don't know that name. Can  
8 you spell it for me?

9 Q. W-A, apostrophe, E-L. And  
10 there's various ways to spell the last  
11 name, J-E-L-A-I-D-E-N is the way I would  
12 spell it.

13 A. No, I don't know him. I do  
14 not know Wa'el Julaidan.

15 Q. Have you ever worked  
16 professionally for WAMY?

17 A. Never.

18 Q. Have you ever worked  
19 professionally with WAMY?

20 A. No.

21 Q. Have you ever worked with or  
22 for any Saudi charity or any NGO in  
23 Saudi -- in the Kingdom of Saudi Arabia?

24 A. No, I've never worked for

1 Ambassador, correct?

2 A. Yes. In addition to many  
3 other agencies.

4 Q. What other agencies?

5 A. Well, for example, the  
6 United States had a military training  
7 mission to the Saudi Arabia National  
8 Guard, a military training mission to the  
9 five other Saudi Armed Forces, meaning  
10 the Land Forces, the Air Force, the Air  
11 Defense Force, the Navy and the Frontier  
12 Forces.

13 The -- there were people  
14 embedded in Saudi ministries. I  
15 mentioned the U.S. Geological Survey, 43  
16 people embedded in the Royal Saudi  
17 Geological Survey doing a survey of Saudi  
18 mineral and metals resources. Census  
19 people who helped build the Saudi census  
20 capability and so forth.

21 A lot of people --

22 Q. I want to -- I just want to  
23 clarify, though. I want to stick you to  
24 the terrorism issues --

1 A. Yes.

2 Q. -- informing you on  
3 terrorism issues as well?

4 A. Anybody who had information  
5 would have provided it. You asked the  
6 principal sources of information, and I  
7 gave them to you.

8 Q. Okay. All right. And  
9 since -- since you've left, are those  
10 still the principal sources of  
11 information to the person that -- you  
12 know, the people who have succeeded over  
13 there?

14 A. I don't know that  
15 personally, but I would expect so. These  
16 are institutional relationships. They're  
17 longstanding. They are commonplace in  
18 embassies throughout the world. Saudi  
19 Arabia is not unique.

20 Q. And would you surmise that  
21 the resources devoted to terrorism since  
22 you left the Kingdom have probably  
23 increased or decreased or stayed the  
24 same?

1 President for coordinating all agency  
2 operations in the country to which he or  
3 she is assigned.

4 Q. But my question -- I'm  
5 sorry, my question was -- I was limiting  
6 my question to just terrorism issues.

7 Is it true that it's a yes,  
8 if you just limit it to terrorism issues?

9 A. Yes. I would have been the  
10 ultimate decision-maker on whether to  
11 report something to Washington, whether  
12 to make a recommendation on how to deal  
13 with it, and often would have been the  
14 person who went to meet a senior Saudi  
15 official to make an argument on behalf of  
16 the U.S. government.

17 Q. Just so I'm clear, though,  
18 what my question is, is I'm asking you,  
19 did you trust those sources of  
20 information to make the assessments that  
21 were derived out of the discussion group  
22 in order to do your functions?

23 A. If you're asking whether I  
24 had competent staff, yes, I did. But I

1                   Q.        When you say it was  
2    "supposed to be," are you -- do you have  
3    information that leads you to believe  
4    that's not correct?

5                   A.        This was an issue in dispute  
6    at the time. There were trials, and that  
7    was the finding in the trials.

8                   Q.        My question to you is, are  
9    you doubting that? Do you think it was  
10   somebody else that was responsible for  
11   that terror attack?

12                  A.        I have no reason to believe  
13    it was anybody else.

14                  Q.        Okay. Your report, I think,  
15    indicates that attacks against the  
16   Kingdom, against the monarchy, were  
17   taking place before September 11th.

18                  Which attacks are you  
19   referring to that were -- that Al Qaeda  
20   was responsible for?

21                  A.        I can't be specific on that.

22                  Q.        Are you aware of any?

23                  A.        All I know is that when I  
24   visited Saudi Arabia in the late 1990s,

1 every time I entered a government  
2 building, I either read signage or heard  
3 an audiotape denouncing Al Qaeda and  
4 similar extremists and urging the  
5 citizenry to be vigilant against possible  
6 attacks.

7 So, clearly, there was a  
8 great concern on the part of the Kingdom  
9 and its institutions about this enemy of  
10 their state. Openly proclaimed enemy, I  
11 should say.

12 Q. So my question is pretty  
13 specific. I want to know what you are  
14 basing your opinion on that there were Al  
15 Qaeda attacks on the Kingdom before  
16 September 11th, 2001. If you know any,  
17 I'd like to know.

18 A. I can't make specific  
19 attributions.

20 Q. Okay. You are aware that Al  
21 Qaeda was believed to be responsible for  
22 the bombing of U.S. embassies in East  
23 Africa in 1998, correct?

24 A. Yes.

1                   probably a long -- it's probably  
2                   near the end, I think.

3                   Keep going. Just scroll  
4                   down to the next page, please.

5                   Next page, please. Next page.

6                   That's it. Sorry. If you  
7                   go back, you can see the bottom,  
8                   there is Tidewater? Right there.

9                   THE WITNESS: Yeah, that's  
10                   the comment that I quoted.

11                  BY MR. MALONEY:

12                  Q.     So you quoted a blogger who  
13                  was commenting on Colonel Patrick Lang's  
14                  posting, correct?

15                  A.     Yes.

16                  Q.     And it looks like you lifted  
17                  this entire quote from Tidewater and put  
18                  it into your report; is that right?

19                  A.     Yes. Because it rang  
20                  absolutely true.

21                  Q.     Do you know who Tidewater  
22                  is?

23                  A.     No idea.

24                  Q.     So you're relying on an

1 unknown, anonymous blogger for this  
2 information that's contained in here?

3 A. No. I know most of this  
4 information on my own.

5 Q. Did you -- I'm sorry.

6 A. I found it a useful summary  
7 of the politics of the region and the  
8 origins of the hijackers from that  
9 region.

10 Q. Do you know that -- which of  
11 the hijackers are from that region?

12 A. Some of them have names  
13 which are typical tribal names from that  
14 region.

15 Q. I guess what I'm asking you  
16 is, did you research this? Did you look  
17 at the names of the Saudi hijackers and  
18 determine or find out or investigate what  
19 region of Saudi Arabia they were from?

20 A. Right after 9/11, when they  
21 were identified, yes. I spent some time  
22 doing that for the reasons given here.

23 Q. I'm sorry, you did that why?

24 A. For the reasons given here.

1 That is, there was a lot of  
2 undifferentiated commentary about Saudi  
3 Arabia that completely missed the  
4 subtleties and nuances and the details  
5 that are contained in this particular  
6 entry that we're looking at.

7 Q. Okay. So just tell me, if  
8 you can, what research you did on that  
9 back in the day?

10 A. I looked at the list of  
11 hijackers and I compared it to the tribal  
12 names that I was aware of from that  
13 region.

14 I also looked at the  
15 published information on the hijackers,  
16 and I was very struck by the dominance of  
17 people from this region.

18 Q. Did the publication say that  
19 they were from that region?

20 A. Which publication?

21 Q. The ones you just referred  
22 to.

23 A. Names -- tribal names exist.

24 Q. I want to -- I want to --

1 about the blogger Tidewater?

2 A. Nothing.

3 Q. Did you ever speak to  
4 Tidewater?

5 A. Nope.

6 Q. And when you cite the  
7 Tidewater in Footnote 7 of your report,  
8 you say -- you describe Tidewater as a  
9 former U.S. intelligence officer who  
10 wishes to remain anonymous.

11 How do you know he was a  
12 former U.S. intelligence officer?

13 A. I think I asked the operator  
14 of the blog, Sic Semper Tyrannis, retired  
15 Colonel Lang, if he would identify the  
16 person who wrote such a thorough and, in  
17 my view, accurate description of the  
18 origin of the hijackers and was told that  
19 he wished to remain anonymous.

20 Q. Well, how do you know he was  
21 a former U.S. intelligence officer?

22 A. Because I trust Colonel  
23 Lang.

24 Q. So you've never actually

1 spoken to Tidewater at all?

2 A. No.

3 Q. And you don't, in fact, know  
4 that he's a former U.S. intelligence  
5 officer, correct?

6 A. I have the assurance of  
7 somebody I trust that he is.

8 Q. All right. And the only way  
9 that you know that he preferred to remain  
10 anonymous is because this Mr. Lang -- is  
11 it Colonel Lang -- told you that he was  
12 U.S. intelligence or a former U.S.  
13 intelligence officer who didn't want  
14 anybody to know who he was?

15 A. I asked Colonel Lang, as I  
16 recall, whether I could identify him.  
17 And that was the reply I got.

18 Q. So you don't, in fact, know,  
19 other than by secondhand information, who  
20 he is; and you don't, in fact, know,  
21 other than secondhand information, that  
22 he wants to remain anonymous; is that a  
23 fair characterization?

24 A. I've accepted the assurance

1 of someone on both points. I have no  
2 direct knowledge of that, no.

3 Q. By taking information off of  
4 the Internet from a source that you've  
5 never spoken to, someone that you only  
6 know who they are through secondhand  
7 information, and taking secondhand  
8 information and not being allowed to  
9 speak to the source, based on a refusal  
10 by the person that runs the blog, that's  
11 what you're basing your information on to  
12 be able to cite to him as a former U.S.  
13 intelligence officer?

14 MR. GOETZ: Objection.

15 Form.

16 THE WITNESS: No. The  
17 reason this caught my eye was that  
18 it coincided with everything that  
19 I personally knew, on the basis of  
20 looking at the names of the  
21 hijackers, the description of  
22 them, their whereabouts, and what  
23 I knew about that particular  
24 region of Saudi Arabia, which I

1 visited.

2 So the information that  
3 whoever Tidewater is provided  
4 struck me as exceptionally  
5 accurate and perceptive.

6 I'm not going on him, I'm  
7 going on my own views.

8 BY MR. HAEFELE:

17 MR. GOETZ: Objection.

18 Form.

19 MR. HAEFELE: You can answer  
20 the question.

1                   Q.     So can you just give us an  
2 estimate, Ambassador Freeman, of when you  
3 talk about these meetings with Saudi  
4 government officials, people in Saudi  
5 business and also U.S. intelligence  
6 officials that you've had in the years  
7 since you left the Foreign Service that  
8 have informed your opinions in the case,  
9 how many meetings are we talking about?

10                  A.     Probably two to three a  
11 year.

12                  Q.     For a period of how many  
13 years?

14                  A.     I believe 15.

15                  Q.     You were asked a lot of  
16 questions about the Mid East Policy  
17 Council. I want to just ask you a very  
18 few about that.

19                           I think the implication  
20 is -- here is that Saudi Arabia bought  
21 the opinions of the Middle East Policy  
22 Council and everybody associated with it.

23                           Is that true?

24                  A.     No. The board was entirely